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VIA ECF

The Honorable J. Paul Oetken
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2101
New York, NY 10007

Re: SEC v. Hwang, et al., No. 22-cv-3402 (JPO)

Dear Judge Oetken:

This firm represents Defendant Sung Kook (Bill) Hwang in the above-captioned matter. We write to respectfully renew Mr. Hwang's request for oral argument, (ECF No. 57), regarding Mr. Hwang's Motion to Dismiss the Amended Complaint (ECF No. 47). That motion presents many complex and extremely important issues, including but not limited to the Plaintiff SEC's novel theory of market manipulation, specifically that "manipulative intent" alone can cause otherwise legal trading activity to become unlawful market manipulation. We respectfully submit that oral argument may assist the Court in deciding our challenge to that theory, as well as the numerous other important legal issues presented in the Motion.

If the Court has any questions or concerns with regard to this request, please do not hesitate to call me. Thank you very much for your kind consideration.

Respectfully submitted,

s/ Lawrence S. Lustberg
Lawrence S. Lustberg

cc: All counsel of record (via ECF)